

EXHIBIT

A

FILE COPY

Venna and Davis Stevenson

Case No.

22CC-2018-CV-124

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Venna and Davis Stevenson
Walmart,
CMI, Cincinnati Inc. Co.,
GE Appliances, Oshkosh Electronics,
And Erie Manufacturing Co.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

FILED December 31 2018
3:43 PM

Parista A. Lewis
Circuit Court Clerk AS

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Venna
Venna Stevenson

Street Address

111 Louise Dr

City and County

Dickson, Dickson

State and Zip Code

TN, 37055

Telephone Number

615 761 7951

E-mail Address

aaaceosolutions@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Walmart
Job or Title (*if known*)
Street Address 702 Southwest 8th Street
City and County Bentonville,
State and Zip Code AK, 72716
Telephone Number 4792734000
E-mail Address (*if known*)

Defendant No. 2

Name CMI
Job or Title (*if known*)
Street Address 922 Walnut St Ste. B
City and County Rogers,
State and Zip Code AK, 72736-3540
Telephone Number (800) 527-0566
E-mail Address (*if known*)

Defendant No. 3

Name Cincinitti Inc Co.
Job or Title (*if known*)
Street Address 6200 S Gilmore Rd.
City and County Fairfield,
State and Zip Code OH, 45014
Telephone Number 877 242 2844
E-mail Address (*if known*)

Defendant No. 4

Name GE Appliances
Job or Title (*if known*)
Street Address 4000 Buecher Rd.
City and County Louisville,
State and Zip Code KY, 40224
Telephone Number 502 452 4311
E-mail Address (*if known*)

Defendant # 5 - North Lincoln Electronics (name)
501 510am Springs AR, Street Address - Address: 14635 Herde Harding
479-524-6913 City - ? Flushing, NY 11367
Gree Manufacturing Co. Telephone number - ? Expy
Case 3:19-cv-00140 Document 1-2 Filed 02/12/19 Page 2 of 19 PageID #: 8

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Davis Stevenson, is a citizen of the
State of (name) Tennessee.

b. If the plaintiff is a corporation

The plaintiff, (name) Walmart, is incorporated
under the laws of the State of (name) Arkansas
and has its principal place of business in the State of (name)
Arkansas.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* Walmart, is incorporated under the laws of the State of *(name)* Arkansas, and has its principal place of business in the State of *(name)* Arkansas.
Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
\$17.5 million

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Plaintiff purchased an air conditioning unit from Walmart and it was installed professionally by the plaintiff's own professionals. The air conditioning unit malfunctioned and flooded the plaintiff's home, causing mold and permanent damage to the plaintiff's health.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. Plaintiff would ask restitution for damages incurred to the home in the amount of \$750,000.00
2. Plaintiff would ask the court for restitution for damages incurred to their health and permanent well-being in the amount of \$16,750,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

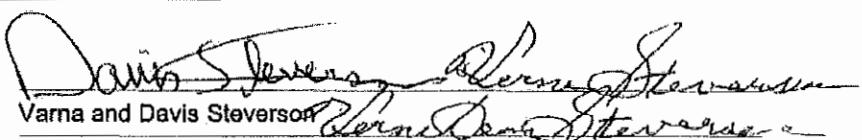
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/04/2018

Signature of Plaintiff

Printed Name of Plaintiff



Varna and Davis Stevenson

B. For Attorneys

Date of signing: 12 4 18

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Self Representation

615-761-7951

999ceosolutions@gmail.com



DMA

Dickson Medical Associates

FAMILY PRACTICE

Rolland E. Luplow, M.D.
Van F. Mills, M.D.
John C.W. Morse, M.D.
Robert W. Orgain, M.D.
John R. Salyer, M.D.
Desmond White, M.D.
Tiffany Bryant, P.A.
Lori Green, N.P.
Kay Murphy, N.P.
Kelley Ross, N.P.

ALLERGY/ASTHMA/ SINUS

Jean Alexander, M.D.

CARDIOLOGY

David Blazer, M.D.
David Chambers, M.D.
Ehab Kasabeh, M.D.

DERMATOLOGY

Dolores Lucas, M.D.

INTERNAL MEDICINE

David Ross, M.D.
Kerry Ross, M.D.
Anna Szczuka, M.D.

NEUROLOGY

Vera Hufnagle, M.D.

ORTHOPAEDICS, SPORTS MEDICINE & SPINE SURGERY

Brook Adams, M.D.
J. Stacy Dinkins, D.O.
Jan M. Gorany, M.D.

PATHOLOGY

Venk Mani, M.D.

PEDIATRICS

Jeffrey S. Gordon, M.D.
Mary K McNeal, M.D.
Kerry Russ, M.D.
Maria Lastovka, P.N.P.
Kelley Sharp, P.N.P.

SLEEP MEDICINE

Mohammad Alsoub, M.D.

SURGERY

Gustavo Huerta, M.D.
Eldred H. Wisser, M.D.

127 Crestview Park Drive
Dickson, TN 37055
Phone: 615-446-5121
www.dicksonmd.com

April 18, 2018

RE: Verna D. Stevenson
DOB: 05/15/1932
MRN: 6917

To Whom It May Concern:

Ms. Verna Stevenson is an 85-year-old patient of mine whom I saw in the office on April 12, 2018. At that time, she was having bronchospasms. She has had mold exposure from mold that has developed in her house since a recent flood. These pulmonary problems with bronchospasm are typical of mold exposure in people who are sensitive. Ms. Stevenson's allergy panel that came back today was positive for allergy to fungi and molds. It is my opinion that it is not safe or reasonable for Ms. Stevenson to be in the home with the mold still in place. Her abnormal breathing function is exacerbated when she is in the house. This gives her coughing, wheezing, and difficulty breathing. If I can be of further assistance, please notify me.

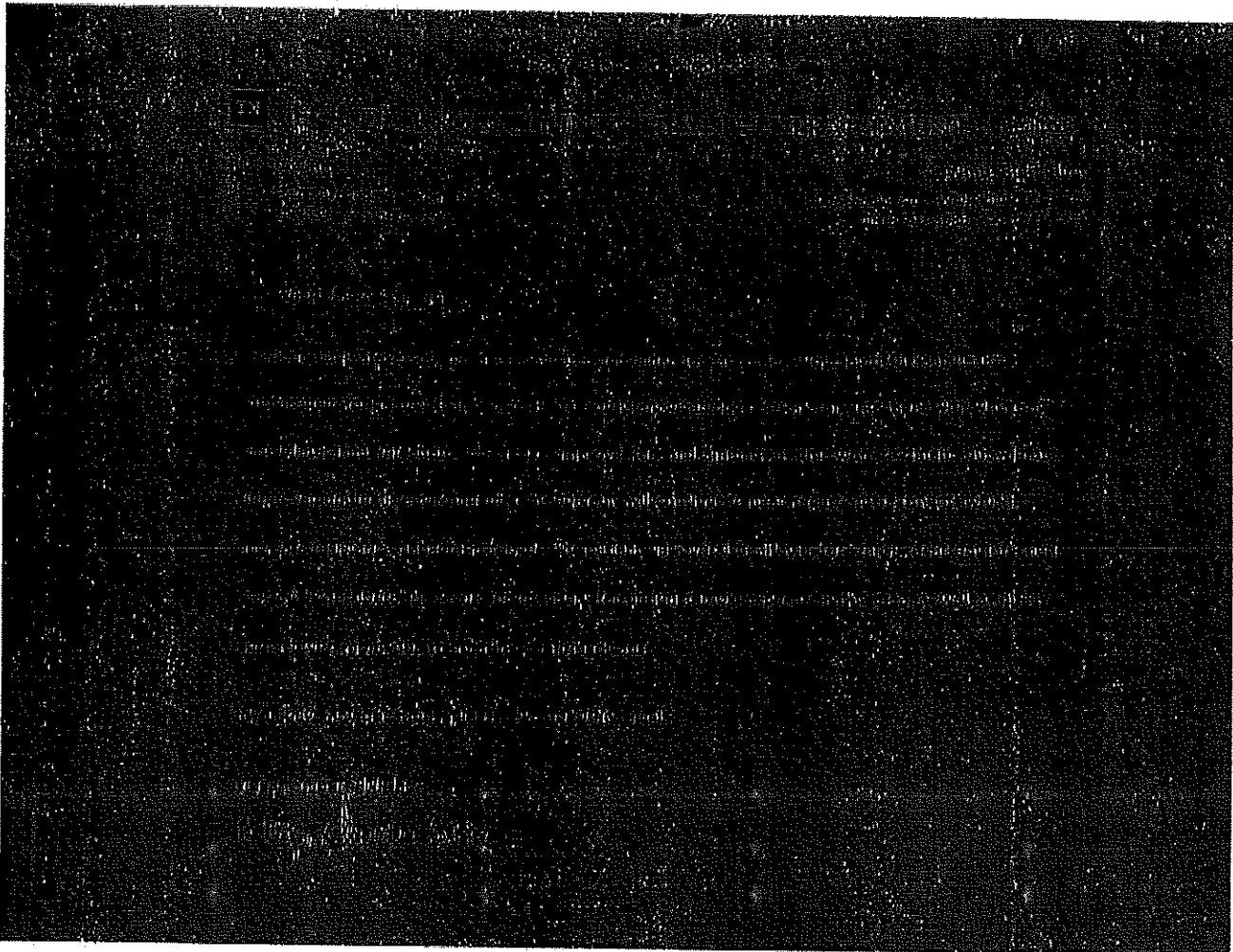
Sincerely,

Rolland E. Luplow II, M.D.

REL/jt

FILED December 31 2018
3:43 PM

Pamela A. Lewis /
Circuit Court Clerk



FILED December 31 2018
3:43 PM
Pamela A. Lewis
Circuit Court Clerk



AAA Solutions <aaaceosolutions@gmail.com>

letter of explanation

2 messages

AAA Solutions <aaaceosolutions@gmail.com>
To: AAA Solutions <aaaceosolutions@gmail.com>

Fri, Dec 28, 2018 at 3:08 PM

Due to the damage done to our health and home caused by the GE air conditioner unit malfunctioning, therefore completely destroying our home, and permianly and continuously causing irreversible and ongoing damage to our families health. We hereby file suit against all responsible parties.

We have continuously tried to work with these responsible companies, asking them to repair the damage caused by this faulty air conditioner unit. These companies led us to believe that they were going to help us in repairing the damages done. The companies responsible have made no effort in the repair of our home. Therefore, the damage being unrepairs for so long caused my family to be deadly ill.

This damage if taken care of when we contacted the companies responsible would not have resulted in the permanent bodily injuries to our family and our home.

Sincerely,

—Donna and Davis Stevenson
*Vera***AAA Solutions** <aaaceosolutions@gmail.com>
To: AAA Solutions <aaaceosolutions@gmail.com>

Fri, Dec 28, 2018 at 3:11 PM

FILED December 31 2018
3:43 PMPamela A. Lewis
Circuit Court Clerk

----- Forwarded message -----

From: AAA Solutions <aaaceosolutions@gmail.com>
Date: Fri, Dec 28, 2018 at 3:08 PM
Subject: letter of explanation
To: AAA Solutions <aaaceosolutions@gmail.com>

Due to the damage done to our health and home caused by the GE air conditioner unit malfunctioning, therefore completely destroying our home, and permianly and continuously causing irreversible and ongoing damage to our families health. We hereby file suit against all responsible parties.

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This damage if taken care of when we contacted the companies responsible would not have resulted in the permanent bodily injuries to our family and our home.

On April 2018 we received confirmation from our doctors that this toxic mold were causing severe health problems and we were ordered to leave our homes immediately.

Sincerely,
Donna and Davis Stevenson



AAA Solutions <aaaceosolutions@gmail.com>

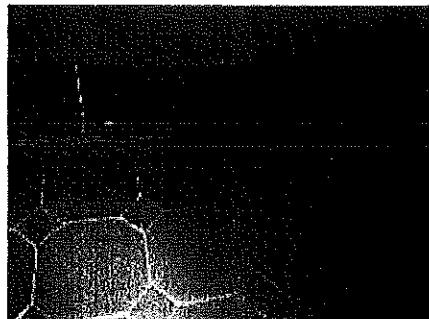
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1 message

AAA Solutions <aaaceosolutions@gmail.com>
To: AAA Solutions <aaaceosolutions@gmail.com>

Fri, Dec 28, 2018 at 2:48 PM

8 attachments



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FILED December 31 2018
3:43 PM

Pamela A. Lewis *PLS*
Circuit Court Clerk



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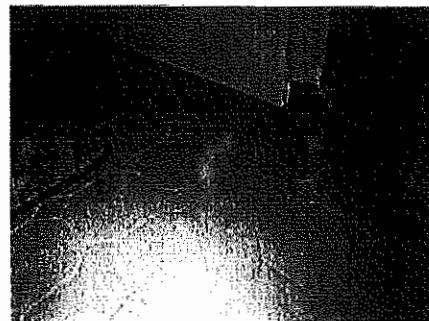


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FILED December 31 2018
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Pamela A. Lewis /BS.
Circuit Court Clerk



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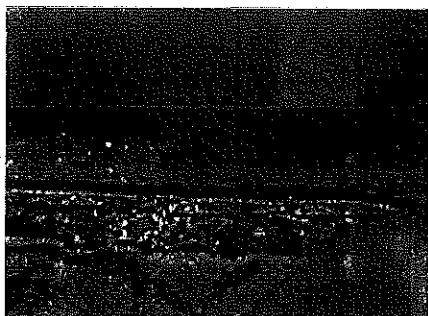
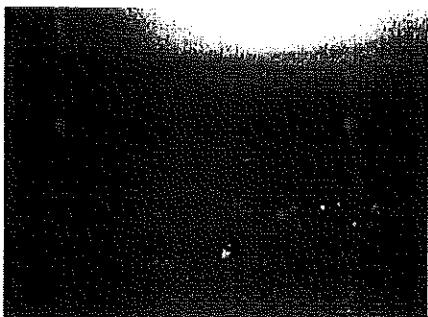
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AAA Solutions <aaaceosolutions@gmail.com>**(no subject)**

1 message

AAA Solutions <aaaceosolutions@gmail.com>
To: AAA Solutions <aaaceosolutions@gmail.com>

Fri, Dec 28, 2018 at 2:52 PM

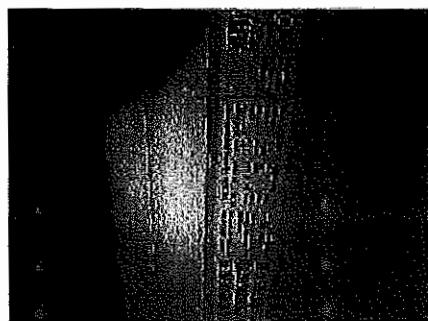
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3:43 P MPamela A. Lewis
Circuit Court Clerk**IMG_20180207_223314.jpg**
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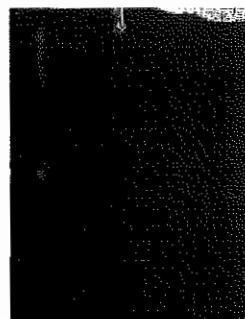


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Pamela A. Lewis
Circuit Court Clerk

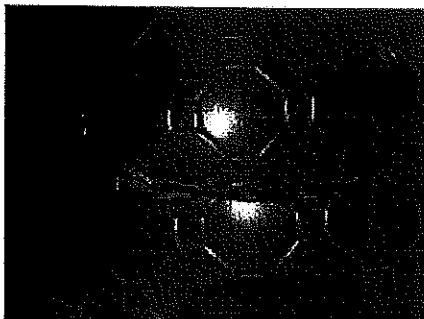


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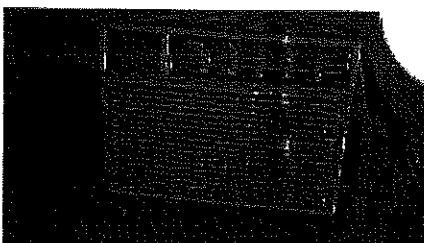
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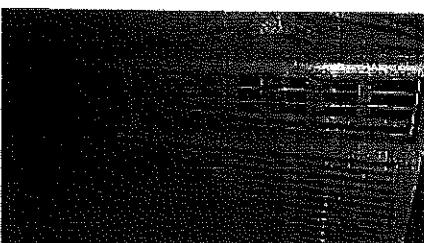


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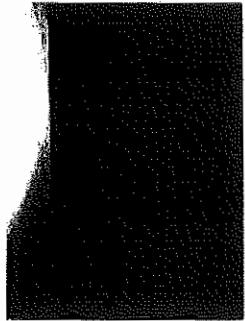


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Pamela A. Lewis
Circuit Court Clerk



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FILED December 31 2018
3:43 PM
Pamela A. Lewis
Circuit Court Clerk *[Signature]*



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

OZARK ELECTRONICS
501 NORTH LINCOLN ST.
SILOAM SPRINGS, AK 72761

01/17/2019

RE: Verna and Davis Stevenson

VS: WALMART, ET AL

Notice of Service

The enclosed process, notice or demand is hereby officially served upon you by the Tennessee Secretary of State pursuant to Tennessee law. Please refer to the process, notice or demand for details concerning the legal matter. If you have any questions, please contact the clerk of the court that issued the process, notice or demand.

The process, notice or demand may have a court date and time that you must appear to defend yourself or the number of days from the date of service by which you are required to file an answer. Failure to appear in court at the time specified or failure to file an answer in the given time could result in a default judgement being rendered against you for relief sought in the lawsuit.

The Secretary of State's office cannot give you legal advice. If you need legal advice, please consult a private attorney.

Tre Hargett
Secretary of State

Enclosures: Original Documents

DOCUMENT INFORMATION

SOS Summons #: 06848087
Case #: 22CC-2018-CV-124
Certified #: 70181830000045464933

Verna and Davis Stevenson vs. Walmart, et al.	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number 22cr-2018-CU-124
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Served On: Spark Electronics
5D1 North Lincoln St., Gilham Springs, AK. (479) 524-6913.

You are hereby summoned to defend a civil action filed against you in _____ County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the required date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: December 31, 2018

Tom Lewis/BS
Clerk / Deputy Clerk

Attorney for Plaintiff: John Doe

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA §26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to execute it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____, Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk –

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

Date:

By:

Please Print: Officer, Title

Agency Address

Signature

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____ . On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)

ADA: If you need assistance or accommodations because of a disability, please call _____ ADA Coordinator, at _____.

Rev. 8/05/10

Court County Tennessee	PAUPER'S OATH IN LIEU OF APPEAL BOND	Case Number <i>228-2018-CV-1247</i>
<u>Verna and Davis Stevenson</u> , vs. <u>Walmart, CMI, Cincinnati Ind. Co., GE Appliances, Ozark Electronics, And Gree manufacturing Co.</u>		

Davis W. Stevenson
Verna Dean Stevenson, do solemnly swear that I am a resident of the State of Tennessee, and that owing to my poverty, I am not able to bear the expense of an appeal from the judgment of the Court in the above styled case to the Circuit Court of Dickson County, at Chapmanville Tennessee, which has this day been taken and granted, and that I am justly entitled to the relief sought, to the best of my belief.

Sworn to and subscribed before me, this day 21st day of December, 2018.

FILED December 31 2018
3:43 PM
Pamela A. Lewis
Circuit Court Clerk /BS

Court
County
Tennessee

UNIFORM CIVIL
AFFIDAVIT OF INDIGENCE

Case Number

page 1 of 2

22cc-2018-CV-24

vs.

I, _____, having been duly sworn according to law, make oath that because of my poverty, I am unable to bear the expenses of this case and that I am justly entitled to the relief sought to the best of my belief. The following facts support my poverty.

1. Full Name: Verna & Davis Stevenson. Address: 111 House on Dickson Tr. 32058
3. Telephone Number: 615-726-1295 4. Date of Birth: 5-7-53 - 9-28-64
5. Names and Ages of All Dependents:

Mother & Son

Relationship: Son
Relationship:
Relationship:
Relationship:

6. I am employed by: 20 & no Davis's Disablity
My employer's address is: _____
My employer's phone number is: _____

7. My Present income, after federal income and social security taxes, are deducted, is: \$ _____
8. I receive or expect to receive money from the following sources:

AFDC	\$ <u>2</u>	per month	beginning _____
SSI	\$ <u>127.37</u>	per month	beginning _____
Retirement	\$ <u>817.47</u>	per month	beginning _____
Disability	\$ <u>510.00</u>	per month	beginning _____
Unemployment	\$ <u>712</u>	per month	beginning _____
Worker's Compensation	\$ <u>260</u>	per month	beginning _____
Other	\$ <u>270.40</u>	per month	beginning _____

9. My expenses are:

Rent/House Payment	\$ <u>853</u>	per month	Medical/Dental	\$ <u>200</u> per month
Groceries	\$ <u>30</u>	per month	Telephone	\$ <u>87.42</u> per month
Electricity	\$ <u>110</u>	per month	School Supplies	\$ <u>—</u> per month
Water	\$ <u>60</u>	per month	Clothing	\$ <u>—</u> per month
Gas	\$ <u>50</u>	per month	Child Care or	\$ <u>—</u> per month
Transportation	\$ <u>150</u>	per month	Court Ordered Child Support	\$ <u>—</u> per month
			Other	Rent Apt. \$ <u>650</u> per month

10. Assets:

Automobile	\$ <u>12.92</u>	(FMV)
Checking/Savings Account	\$ <u>yes</u>	
House	\$ <u>—</u>	(FMV)
Other	\$ <u>—</u>	

11. My debts are:

Amount Owed	
<u>125,000</u>	House
<u>800.00</u>	Car
<u>82.00</u>	F&S car

To Whom

I hereby declare under the penalty of perjury that the foregoing answers are true, correct, and complete and that I am financially unable to pay the costs of this action.

Vernon Davis Stevenson & John S. Smith
PLAINTIFF

ORDER ALLOWING FILING ON PAUPER'S OATH

It appears based upon the Affidavit of Indigency filed in this cause and after due inquiry made that the Plaintiff is an indigent person and is qualified to file case upon a pauper's oath.

Court County Tennessee	UNIFORM CIVIL AFFIDAVIT OF INDIGENCY page 2 of 2	Case Number <i>2dCC-2018-CV-124</i>
vs. _____		

It is so ordered this _____ day of _____, 20_____

JUDGE

DETERMINATION OF NONINDIGENCE

It appearing based upon the Affidavit of Indigency filed in this cause and after due inquiry made that the Plaintiff is not an indigent person because _____.

IT IS ORDERED AND AJUDGED that the Plaintiff does not qualify for filing this case on a pauper's oath.

This the _____ day of _____, 20_____.

JUDGE

NOTICE: If the judge determines that based upon your affidavit you are not eligible to proceed under a pauper's oath, you have the right to a hearing before the judge or, in those cases that can be appealed to Circuit Court, a hearing before the Circuit Court judge.